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Attorneys for Plaintiffs  
WINGSAIL HOLDINGS, LLC  
AND YUNFEI "KRISTY" BAI

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

WINGSAIL HOLDINGS, LLC, a  
Washington Corporation, and YUNFEI  
"KRISTY" BAI, an individual,

Plaintiffs,

vs.

ANDREW POLSKY, an individual, and  
SEFED, a California Corporation, and  
DOES 1 through 10,

Defendants.

Case No. 8:23-CV-02398-JWH-DFM  
Honorable John W. Holcomb

**JOINT STIPULATION REGARDING  
PLAINTIFF WINGSAIL HOLDINGS,  
LLC'S DEPOSITION**

Date Action Filed: August 23, 2024  
Trial Date: March 16, 2025

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1 Plaintiffs Wingsail Holdings, LLC (“Wingsail”) and Yunfei “Kristy” Bai  
2 (collectively, “Plaintiffs”) on the one hand, and Defendants Andrew Polsky and  
3 SEFED (collectively, “Defendants”) on the other hand, by and through their  
4 respective counsel of record, hereby stipulate and agree as follows:

5 1. On August 14, 2025, Defendants issued “Defendants’ Notice of  
6 Deposition of Plaintiff Wingsail Holdings, LLC” (the “Notice”) through which  
7 Wingsail’s deposition was scheduled to proceed on September 16, 2025 in Irvine,  
8 California.

9 2. Wingsail did not appear for its deposition.

10 3. On September 10, 2025, the parties met and conferred regarding  
11 Wingsail’s non-appearance. The parties did not resolve the discovery dispute and  
12 accordingly, an Information Discovery Conference (“IDC”) was scheduled.

13 4. On September 19, 2025, the parties filed their respective letter briefs for  
14 the IDC.

15 5. On September 20, 2025, the IDC was conducted before Judge  
16 McCormick during which further briefing was ordered and the IDC was continued to  
17 October 9, 2025.

18 6. On October 1, 2025, the parties were able to resolve the discovery dispute  
19 pertaining to Wingsail’s deposition as follows: Wingsail shall appear in person for its  
20 deposition pursuant to the Notice on November 3, 2025.

21  
22 **SO STIPULATED.**

23  
24 Dated: October 3, 2025

RUTAN & TUCKER, LLP

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26 By: /s/ Alejandro S. Angulo  
27 Alejandro S. Angulo  
28 Attorneys for Defendants  
ANDREW POLSKY and SEFED

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Dated: October 3, 2025

BUUS LAW GROUP APC

By: /s/ William L. Buus

William L. Buus  
Attorneys for Plaintiffs  
WINGSAIL HOLDINGS, LLC  
AND YUNFEI "KRISTY" BAI

**L.R. 5-4.3.4(a)(2) CERTIFICATION**

Pursuant to L.R. 5-4.3.4(a)(2), the undersigned certifies that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 2, 2025

/s/ Alejandro S. Angulo  
Alejandro S. Angulo